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November 2, 2021

VIA ECF
Honorable Katharine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Discovery for Information About Former Employees
Eusebia Reneyda Cuello v. Healthfirst PHSP, Inc.
Case No. 1:20-cv-10177-JPO-KHP

Dear Judge Parker:

We represent Plaintiff Eusebia Reneyda Cuello and write to request information detailed in our letter of September 24, 2021. We have modified our request pursuant to our conference on November 1, 2021.

To review, in July 2021, we posed the following demand:

Identify any former agents and/or employees of Defendant who were terminated for the reasons Plaintiff was terminated for.

Defendant replied:

Defendant interprets this request as seeking identification of other employees within PHSP Facilitated Enrollment whose employment was terminated in or about May 2020 for reasons parallel to those specified in HF0052 and identifies them as follows to protect their privacy: (1) CC; (2) CR; (3) JP; and (4) MC.

At our conference on November 1, 2021, your Honor suggested that we request information about the four individuals that would not impose an undue burden on Defendant. In accordance with your guidelines we request the individuals':

- gender
- length of time working for Healthfirst
- supervisors (including the District Manager and Manager)
- performance reviews, 2014-2019

can be granted
by US
initials
of employees

- dates of rewards
- disciplinary record

Thank you for your consideration.

Sincerely,

/s/ G. Oliver Koppell

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